

CASEY D. GISH, ESQ.
Nevada Bar No. 006657

THE LAW OFFICE OF CASEY D. GISH

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AMY VILELA, an individual;
JOZETTE FIGUEREDO, an individual;
AMY VILELA, as Special Administrator of the
Estate of SHALYNNE RAMOS,

Plaintiffs,

vs.

VALLEY HEALTH SYSTEM, LLC, d/b/a
CENTENNIAL HILLS HOSPITAL MEDICAL
CENTER, a Delaware Limited Liability
Company;
UNIVERSAL HEALTH SERVICES, INC., a
Delaware corporation; VALLEY HOSPITAL
MEDICAL CENTER, INC., a Nevada
Corporation; EMCARE, INC., a Delaware
Corporation; Tanya Netz PAC; Jill Mcatee, RN;
DOE Defendants I through X, inclusive; ROE
NURSES I through XX, inclusive; ZOE
HOSPITALS or OTHER MEDICAL
FACILITIES I through X; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:16-cv-01503-RFB-CWH

**STIPULATION AND PROPOSED
ORDER TO EXTEND DUE DATE FOR
THE JOINT PRE-TRIAL ORDER**

Plaintiffs, by and through their attorney of record, CASEY D. GISH, ESQ., of THE
LAW OFFICE OF CASEY D. GISH, and CRAIG D. SLATER, ESQ. of LUH &
ASSOCIATES; and Defendants, VALLEY HEALTH SYSTEM, LLC, d/b/a CENTENNIAL
HILLS HOSPITAL MEDICAL CENTER and JILL MCATEE, RN, by and through their
attorney of record CASEY TYLER, ESQ. and CHARLOTTE BUYS, ESQ., of HALL

PRANGLE & SCHOONVELD, LLC; and Defendants, TANYA NETZ, PAC, and EMCARE, INC., by and through their attorney of record TODD WEISS, ESQ., of JOHN H. COTTON AND ASSOCIATES, LTD, hereby stipulate as follows:

- (1) As per Document No. 114 Minutes of Proceedings on Motion Hearing Held on March 3, 2021 before the Honorable Richard F. Boulware, II, served on March 5, 2021 at 6:23 P.M. PST, "FURTHER ORDERED that parties shall submit a joint pre-trial order within three weeks with proposed trial dates starting in May and June 2021."
- (2) Due to multiple objections from the defendants to Plaintiffs' proposed Joint Pre-Trial order, the parties have agreed to conduct a telephonic dispute conference on March 31, 2021 at 10:00 a.m. to attempt to resolve the remaining disputes pertaining to Plaintiffs' proposed Pre-Trial Report.
- (3) The parties have agreed that the due date to submit the Pre-Trial order should be extended to April 2, 2021.
- (4) No parties will be prejudiced by this short extension. There is no pending trial date in this matter.
- (5) This is the first request for an extension of this date.

IT IS SO STIPULATED.

DATED this 26th day of March, 2021

LAW OFFICE OF CASEY D. GISH
/s/ Casey D. Gish
 CASEY D. GISH, ESQ.
 Nevada Bar No. 6657
Co-counsel for Plaintiffs

DATED this 26th day of March, 2021

JOHN H. COTTON & ASSOCATES, LTD.
/s/ Todd Weiss
 TODD WEISS, ESQ.
 Nevada Bar No. 14130

DATED this 26th day of March, 2021

LUH & ASSOCIATES
/s/ Craig D. Slater
 CRAIG D. SLATER, ESQ.
 Nevada Bar No. 8667
Co-counsel for Plaintiffs

DATED this 26th day of March, 2021

HALL PRANGLE & SCHOONVELD
/s/ Charlotte Buys
 CHARLOTTE BUYS, ESQ.
 Nevada Bar No. 14845

*Counsel for Defendant Tanya Netz, PAC and
Emcare, Inc.*

*Counsel for Defendants Valley Health
System, LLC d/b/a Centennial Hills
Hospital Medical Center; and Jill
Mcatee, RN*

ORDER

Pursuant to the terms of the foregoing stipulation, the Court orders as follows:

1. Good cause exists for the extension of the due date to submit the Joint Pre-Trial Order.
2. The due date for the Joint Pre-Trial Order is extended to April 2, 2021.

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

DATED: March 29, 2021

Respectfully submitted by:

THE LAW OFFICE OF CASEY D. GISH

/s/ Casey D. Gish

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